

EXHIBIT T

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
CHAPTER 11

CASE NO. 09-50026 (REG)
(Jointly Administered)

IN RE:

MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corporation, et al.,

Debtors,

Transcript Designated Highly Confidential

TRANSCRIPT OF
DEPOSITION OF BAO D. TRUONG

TRANSCRIPT of the stenographic
notes of the proceedings in the
above-entitled matter, as taken by and
before TAB PREWETT, a Registered
Professional Reporter, a Certified
Shorthand Reporter, a Certified LiveNote
Reporter, and Notary Public, held at the
Offices of DICKSTEIN SHAPIRO, 1633
Broadway, New York, New York, on Friday,
April 20, 2012, commencing at 10:13 a.m.

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A P P E A R A N C E S:

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In the transcript. Mr. Chapman
was present as noted in the
Transcript.

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Counsel for the Witness,
Bao Truong

1 Bao Truong

2 B A O D. T R U O N G,

3 doing business at Centerbridge Partners,

4 375 Park Avenue,

5 New York, New York,

6 having been sworn by the notary public to

7 testify to the truth, testified as follows:

8 DIRECT EXAMINATION

9 BY MR. FISHER:

10 Q Good morning, Mr. Truong.

11 A Good morning.

12 Q My name is Eric Fisher. I am

13 going to be asking you a number of

14 questions today. If you don't understand a

15 question, please let me know, and I will be

16 happy to rephrase.

17 Okay. And if you would like to

18 take a break at any point during your

19 deposition, I ask that you let me know,

20 and, as long as there is no question

21 pending, I will be happy to take a break.

22 Is that clear?

23 A Yes.

24 Q Where are you currently

25 employed?

1 Bao Truong

2 A That's correct.

3 Q And what did you do with his
4 signature page?

5 A I kept them.

6 Q And did there come a point in
7 time when you turned his signature page
8 over to someone?

9 A Yes.

10 Q When was that?

11 A After we finalized the
12 agreement.

13 Q And do you remember what time
14 that was?

15 A It was approximately 7:00 a.m.

16 Q And who did you give the
17 signature page to?

18 A I don't recall the -- I don't
19 recall who I handed it to.

20 Q It would -- do you know if it
21 was someone from Weil, or -- do you know if
22 it was someone from Weil?

23 A I don't recall who the
24 individual was.

25 Q Do you have any understanding

1 Bao Truong

2 hard copy of the agreement or not?

3 A I remember -- I recall waiting
4 for a copy of all of the documents, for the
5 document, for the executed document.

6 Having gone through some of the
7 documents that you have shared, I waited
8 for some time. I don't know if I -- I
9 don't recall if I left with the documents
10 or if the document was sent around and
11 shared pursuant to that E-Mail.

12 But the document in itself was
13 in an executed form with signatures
14 certainly in around by 7:00 a.m. is my
15 recollection.

16 Q Okay. And the E-Mail below,
17 Ms. Cowen writes, quote:

18 "I assume Dan or someone will
19 send documents around electronically when
20 ready." Closed quote.

21 To your knowledge, did Dan
22 Gropper ever send around the executed
23 version of the Lock-up Agreement?

24 A I don't recall.

25 Q Following General Motors'

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J U R A T

I DO HEREBY CERTIFY that I have
read the foregoing transcript of my
deposition testimony.

SWORN TO AND SUBSCRIBED
BEFORE ME THIS
DAY OF 2012
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I N D E X

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WITNESS

DIRECT

CROSS

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BAO TRUONG

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BY MR. FISHER

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2	E X H I B I T S	
3	NUMBER DOCUMENT PAGE	
4		
5	There was an instruction not to	13
6	answer.	
7	Exhibit Nos. Fortress 1 to	18
8	Fortress 7 were marked before the	
9	commencement of the deposition.	
10	Certain exhibits were not used	
11	during the deposition	
12	Exhibit No. Fortress 1, Proof of	18
13	Claim Document, Bates Nos. FOR GM	
14	4732 to 4739	
15	Exhibit No. Fortress 7, Fourth	24
16	Amended Verified Statement of	
17	Greenberg Traurig Pursuant to	
18	Bankruptcy Rule 2019	
19	Exhibit No. Fortress 2, Proof of	25
20	Claim Document	
21	There was an instruction not to	45
22	answer.	
23	Exhibit No. Fortress 8, 12/3/08	55
24	E-Mail Chain between Drew	
25	McKnight and Bao Truong, Bates	
	Nos. FOR GM 5436 to 37	
	Exhibit No. Fortress 9, 12/10/08	59
	E-Mail from Bao Truong to Michael	
	Chung, Bates No. FOR GM 5443	
	Exhibit No. Fortress 10, E-Mail	69
	Chain Document, Bates FOR GM 245	

1		
2		
3	Exhibit No. Fortress 11, E-Mail	77
4	Chain between Mr. Truong and	
	Robert Bebb, Bates Nos. FOR GM	
5	490 through 498	
6	Exhibit No. Fortress 12, E-Mail	82
7	Chain between Mr. Truong,	
	Mr. Gropper, et als., Bates No.	
8	FOR GM 550	
9	Exhibit No. Fortress 13, E-Mail	86
10	Chain between Mr. Truong and	
	Leslee Cowen, et als., Bates No	
11	FOR GM 856	
12	Exhibit No. Fortress 14, Message	93
13	from Mr. Truong to Rebecca	
14	Pacholder at Sandell Asset	
15	Management, Bates Nos. FOR GM 436	
16	to 437	
17	Exhibit No. Fortress 15, Document	95
18	with Attachment, Notes of	
19	Mr. Truong, Bates Nos. FOR GM	
20	1050 to 1052	
21	Exhibit No. Fortress 16, E-Mail	100
22	Chain Document, Bates No. FOR GM	
23	2215	
24	Exhibit No. Fortress 17, 5/23/09	101
25	E-Mail Chain with Mr. Truong and	
	Rebecca Pacholder at Sandell	
	Asset Management, Castlerigg	
	Master Investments, Bates Nos.	
	FOR GM 2205 to 2206	
	Exhibit No. Fortress 18, 5/23/09	103
	E-Mail Chain with Mr. Chung and	
	Mr. Truong, Bates No. FOR GM 2209	
	Exhibit No. Fortress 19, 5/23/09	104
	E-Mail Chain, Bates Nos. FOR GM	
	2211 to 2212	

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2
3 Exhibit No. Fortress 20, 5/31/09 122
4 E-Mail Chain with Mr. Woodworth
5 and Mr. Truong, Gropper, and
6 Prieto, et als., Bates Nos. FOR
7 GM 2654 through 2667
8 Exhibit No. Fortress 21, 6/1/09 137
9 E-Mail Chain with Mr. Truong and
10 Ms. Cowen, Bates Nos. FOR GM 2890
11 Exhibit No. Fortress 22, E-Mail 140
12 Chain with Mr. Truong and Leslee
13 Cowen, Re: GM sig, Bates Nos.
14 FOR GM 2897 through 2898
15 Exhibit No. Fortress 23, 144
16 Document, Bates Nos. AUR GM 14277
17 to 14285, a Copy of an 8-K with a
18 filing date of June 1, 2009
19 Exhibit No. Fortress 24, 6/1/09 146
20 E-Mail from Peter Godhard to
21 many, with attached final Lock-up
22 Agreement, Bates Nos. WGM 791 to
23 819
24 Exhibit No. Fortress 25, 5/30/09 158
25 E-Mail Chain with Mr. Truong and
Leslee Cowen, Bates Nos. FOR GM
2639 to 2642
Exhibit No. Fortress 26, E-Mail 163
Chain with attachment, Bates Nos.
FOR GM 2714 through 2715
Exhibit No. Fortress 27, E-Mail 164
Chain Document, Bates Nos. FOR GM
2899 to 2900
Exhibit No. Fortress 28, 6/1/09 167
E-Mail Chain with Mr. Truong and
Mr. Chung, Bates Nos. FOR GM 2976
to 2981

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3 Exhibit No. Fortress 29, 6/1/09 169
4 E-Mail Chain from Ms. Pacholder
5 to Mr. Truong, Bates Nos. FOR GM
6 2982 to 2983
7
8 Exhibit No. Fortress 30, 6/2/09 170
9 E-Mail Chain between Mr. McKnight
10 and Pete Briger, Dean Dakolias,
11 et als., Bates No. FOR GM 2994
12
13 Exhibit No. Fortress 31, E-Mail 173
14 Chain from Jonathon Goldrath to
15 Bao Truong on 7/7/09, Bates Nos.
16 FOR GM 1936 to 1940
17
18 Exhibit No. Fortress 32, 11/3/09 175
19 Summary Document, Bates Nos. FOR
20 GM 4676 to 4681
21
22 Exhibit No. Fortress 33, 12/2/09 175
23 Summary Document, Bates Nos. FOR
24 GM 5421 to 5424
25
26 Exhibit No. Fortress 34, 1/5/10 175
27 Summary Document, Bates Nos. FOR
28 GM 4070 to 4074
29
30 Exhibit No. Fortress 35, 6/3/09 176
31 E-Mail from Mr. Truong to
32 Jennifer Sorkin, Bates No. FOR GM
33 3254
34
35 Exhibit No. Fortress 36, 6/3/09 177
36 E-Mail with attachment, from
37 AnaMaria Fratila to Mr. Truong,
38 Bates Nos. FOR GM 3272 to 3284
39
40 There was an instruction not to 184
41 answer.
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3 Exhibit No. Fortress 37, 6/3/09 188
4 E-Mail Chain from Mr. Truong to
5 Ms. Cowen and Suki Sohn, Bates
6 Nos. FOR GM 3351 to 3353
7
8 There was an instruction not to 195
9 answer.
10
11 Exhibit No. Fortress 38, 6/24/09 197
12 E-Mail from Mr. Truong to Michael
13 Divney, Bates No. FOR GM 1388
14
15 Exhibit No. Fortress 39, 5/22/09 198
16 E-Mail Chain with Mr. McKnight
17 and Bao Truong and Dean Dakolias,
18 Bates Nos. FOR GM 2196 to 2198
19
20 Exhibit No. Fortress 40, 4/27/09 201
21 Chat Conversation Transcript with
22 Mr. Chung and Mr. Truong, Bates
23 Nos. FOR GM 1136 to 1144
24
25 Exhibit No. Fortress 41, Chat 203
Room Transcript of Michael Chung
and Mr. Truong on 6/8/09, Bates
Nos. FOR GM 4003 to 4013

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CERTIFICATE

I, TAB PREWETT, A Registered Professional Reporter, Notary Public, Certified LiveNote Reporter, and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination BAO TRUONG was sworn by the notary public to testify the truth, the whole truth and nothing but the truth. I certify that neither BAO TRUONG nor counsel for BAO TRUONG requested to review the transcript to make changes to form or substance.

I DO FURTHER CERTIFY that the foregoing is a true and accurate transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

Notary Public

My Commission expires February 9, 2014
Dated: April 23, 2012